



KBC GROUP INVESTMENT POLICY

As part of its Sustainability commitments, KBC group applies strict ethical restrictions with regard to investments.

As a basic rule, KBC Group does not invest for its own account nor does it advise its clients to invest in financial instruments (shares, bonds and any other financial instrument) issued by “excluded counterparties”. Excluded counterparties are counterparties which either:

- are listed on the KBC Blacklist: these are companies involved in controversial weapon systems and companies considered “worst offenders of UN Global Compact Principles (UNGC)”; please refer to the [KBC Group Policy on Blacklisted Companies](#) for more details;
- are listed on the KBC Human Rights Offenders List; please refer to the [KBC Group Policy on Human Rights](#) for more details;
- are government entities, public authorities, central and state-owned banks or state-owned companies within a country that is listed on the KBC Controversial Regimes List; please refer to the [KBC Group Policy on Human Rights](#) for more details;
- have activities related to tobacco¹; KBC Asset Management identifies the companies which are in scope based on exclusion criteria already used for its sustainable funds; companies are excluded as soon as one of the following conditions is fulfilled:
 - a screening reveals that the company derive any revenue from the production of tobacco, or essential parts including filters, tobacco paper and flavors of e-cigarettes;
 - non-essential related products/services (such as packaging and processing machinery) account for more than 10% of revenues;
 - a retailer derives more than 10% of sales from tobacco product;
 - or the company has significant ownership of one of these (meaning any stake if we have zero tolerance or the stake is larger than 10% and consolidating the stake would lead to more than 10% of consolidated revenues from the sale of tobacco products).

These rules apply to:

- all investments done by KBC Group for its own account, through the group’s insurance

¹ On 26 March 2019, KBC announced it had signed the Tobacco-Free Finance Pledge, initiated by the international organization Tobacco Free Portfolios, which has been calling on financial institutions worldwide since 2018 to divest from the tobacco industry.

companies or any other group entity;

- all investments advised by KBC Group to its clients, either on an advisory basis or based on a discretionary mandate; this includes both *direct* investments in financial instruments issued by excluded counterparties and *indirect* investments, either via investment funds managed by KBC Asset Management or via funds managed by third parties, providing with regard to the latter that their own investments in excluded counterparties exceed 5% of their total assets.

However, investments in financial instruments issued by excluded counterparties remain possible in the following cases:

- execution only: transactions in financial instruments of excluded counterparties made on the initiative of the client; “transactions” in this sense means „execution only“ of client buy and sell orders in financial instruments issued by excluded counterparties or the keeping of such positions in client securities accounts;
- index-linked investments funds: investment funds whose investment policy in accordance with their statutes or administrative regulations, aims to follow the composition of a particular stock or bond index; only KBC Asset Management can define which index-linked investments funds are allowed²;
- structured funds: structured funds will comply at launch with the KBC Blacklist, the KBC Human Rights Offenders List, activities related to tobacco and the KBC Controversial Regimes List; however during the lifetime of the product the composition of the basket will not reflect changes in the KBC Group Investment Policy; yet structured products will not include new shares resulting from a corporate action if in the meantime the related company has been excluded based on the KBC Group Investment Policy.
- hedge funds and institutional mandates: it will not be possible to enforce a list of excluded counterparties to hedge funds or to institutional mandates.

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² As of 1 March 2019, KBC Asset Management has become a signatory to the “Open letter to global index providers”, initiated by Swiss Sustainable Finance and asking global index providers to exclude controversial weapons from mainstream indices. For more information, please refer to www.sustainablefinance.ch.

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